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Attorney for Material Witness/es

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,	)	Crim. Case No. 07cr2878-LAB
	)	
Plaintiff,	)	NOTICE OF MOTION AND MOTION TO SET
	)	VIDEOTAPE DEPOSITIONS OF MATERIAL
v.	)	WITNESSES AND REQUEST FOR
	)	STATEMENT OF REASONS IN SUPPORT OF
Jose Luis QUINTERO-Arias,	)	CUSTODY
	)	
Defendant.	)	Hearing Date: 11/6/07
	)	Time: 9:00 a.m
	)	Magistrate Judge: Ruben B. Brooks

**TO KAREN P. HEWITT , UNITED STATES ATTORNEY, AND TO THE ATTORNEYS  
OF RECORD FOR JOSE LUIS QUINTERO-ARIAS, DEFENDANT HEREIN:**

PLEASE TAKE NOTICE that on November 6, 2007, at 9:00 a.m., or as soon thereafter as counsel may be heard, material witnesses SALVADOR BARRAGAN-CRUZ and RAUL LIZARRAGA-BORQUEZ (Collectively, "Material Witnesses") by the through their counsel, Tamara D. DeHaan, will bring a motion for a court order to take videotaped depositions of the Material Witnesses. All opposition to the within Motion must be filed with the Court and served on Counsel for the moving party.

**MOTION**

SALVADOR BARRAGAN-CRUZ and RAUL LIZARRAGA-BORQUEZ, by and through their counsel, Tamara D. DeHaan, Esq., and pursuant to 18 U.S.C. §§ 3142 and 3144, and Federal Rules of Criminal Procedure, Rule 15, hereby move this court for an order to take their respective depositions by

1 videotape, and release them at the conclusion of the depositions. If the court denies said motion, then it  
2 will be further requested that the U.S. Attorney provide the Material Witnesses with a Statement of  
3 Reasons in Support of Custody in accordance with Federal Rules of Criminal Procedure., Rule 46 (h)(1)  
4 and (2).

5 This motion is based upon this Notice, the Memorandum of Points and Authorities in Support  
6 thereof, the Declaration of Tamara D. DeHaan, Esq., the files and records in the above-entitled cause,  
7 and any and all other information that may be brought to the Court's attention prior to, or during, the  
8 hearing on this motion.

9 Respectfully submitted,

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11  
12 DATED: October 24, 2007

LAW OFFICES OF TAMARA D. DeHAAN

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14 By: s/Tamara D. DeHaan  
15 Tamara D. DeHaan  
16 Attorney for Material Witnesses  
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